

LAW OFFICE OF
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*Attorneys for the Defendants
identified on Exhibit 1 hereto*

Hearing Date: October 28, 2015

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

V.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

V.

RICHARD M. GLANTZ, et al.

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Complaint, the Declaration of Richard M. Glantz dated April 30, 2015, the Declaration of Bryan Ha dated May 1, 2015, the exhibits thereto, and all the pleadings and proceedings heretofore had herein, the defendants identified on Exhibit 1 hereto (collectively, the "defendants"), by their undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, on a date and at a time to be determined by the Court, for an Order dismissing the Amended Complaint pursuant to Rules 8(a), 9(b), 12(b)(2), 12(b)(6) and 12(b)(7) of the Federal Rules of Civil Procedure and Rules 7008(a), 7009 and 7012(b) of the Federal Rules of Bankruptcy Procedure or, alternatively, staying this action pursuant to 11 U.S.C. § 105, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, to the motion shall be filed with the Bankruptcy Court and served upon counsel for the defendants on or before July 22, 2015, or as otherwise stipulated by and among the parties and ordered by the Court. Reply papers, if any, shall be filed with the Bankruptcy Court and served upon counsel for the Trustee on or before September 16, 2015, or as otherwise stipulated by and among the parties and

ordered by the Court.

Dated: New York, New York
May 1, 2015

Respectfully submitted,

LAW OFFICE OF
RICHARD E. SIGNORELLI

By: /s/ Richard E. Signorelli

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FILING AND SERVICE VIA ELECTRONIC FILING

EXHIBIT 1

RICHARD M. GLANTZ, individually, as trustee of the Richard M. Glantz 1991 Living Trust, the Edward R. Glantz Living Trust, the Thelma Glantz Living Trust, the Glantz-Ostrin Trust I, and the Glantz-Ostrin Trust II, and as personal representative of the Estate of Edward R. Glantz, and as administrator of the Estate of Thelma Glantz

EJS ASSOCIATES, L.P.

JELRIS & ASSOCIATES, L.P.

GRACE & COMPANY

THE RICHARD M. GLANTZ 1991 LIVING TRUST

THE GLANTZ FAMILY FOUNDATION, INC.

THE EDWARD R. GLANTZ LIVING TRUST

THE ESTATE OF EDWARD R. GLANTZ

LAKEVIEW INVESTMENT, LP

VISTA MANAGEMENT CO.

ELAINE OSTRIN, individually and as trustee of the Edward R. Glantz Living Trust

THE THELMA GLANTZ LIVING TRUST

THE ESTATE OF THELMA GLANTZ

THE GLANTZ-OSTRIN TRUST I

THE GLANTZ-OSTRIN TRUST II

AUSTIN BOSARGE

MERLIN & ASSOCIATES, LTD.

ENHANCEMENT GROUP